

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

*Fernando Feijoo, as representative of the
Estate of Eleonora Deutenberg v.
Aurobindo Pharma USA, Inc., et. al.*

NOTICE OF VIDEOTAPED DEPOSITION OF

**FERNANDO FEIJOO, REPRESENTATIVE OF THE ESTATE OF ELEANORA
DEUTENBERG**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, filed November 17, 2020 – Document 632), Defendants Aurobindo Pharma USA, Inc. and Aurolife Pharma LLC will take the deposition upon oral examination of Fernando Feijoo, as the Representative of the Estate of Eleonora Deutenberg, on October 21, 2021 at 9:00 a.m., EDT, and continuing until completion. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Ethan R. Feldman
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(610) 567-0700
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Date: September 17, 2021

Respectfully submitted,

s/ Ethan Feldman
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*Attorney for Defendants
Aurobindo Pharma USA, Inc.,
Aurobindo Pharma Ltd., and
Aurolife Pharma LLC*

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of September, 2021, I caused a true and correct copy of the foregoing Notice of Videotaped Deposition of Fernando Feijoo to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was served on Plaintiff's counsel by e-mail, with a copy served on all parties via MDL Centrality, on September 17, 2021.

This 17th day of September, 2021.

/s/ *Ethan R. Feldman*
Ethan R. Feldman